

  **Our Code of Conduct**
  *Living our values*



Q. Who should follow our Code of Conduct?

A. Everyone who works for GSK

Our Code of Conduct applies to employees and anyone who works for or on behalf* GSK. It helps us understand the values that guide our work. It describes the behaviours we all need to demonstrate to bring those values to life. Just as importantly, it shows us how living our values helps us fulfil our mission of helping people do more, feel better, and live longer.

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Keywords can be used to help you find policies within the values and standards resource centre on Connect GSK.

Look for this icon for further information.



Why is living our values important?

At GSK, we put our values at the heart of every decision we make. Our values guide our day-to-day actions – no matter what. Because we believe that it's not just **what** we achieve that counts, it's also **how** we achieve it.



Speak up if you identify anything of concern
www.gsk.com/speakup



For more information about our speak up programme, please see page 36.

Why do I need to read this?

After reading our Code of Conduct you should:

- 1 Understand each of our values
- 2 Use the values to guide your everyday decision-making
- 3 Understand our core standards that uphold ethical behaviours

* We expect those who work for or on behalf of GSK in a non-employee capacity (eg our complementary workforce – CWs) to comply with this Code as a term of their engagement or contract. This Code must always be applied to non-employees in a way that is consistent with local labour laws or regulations, and our written standards for engagement of non-employee resources (per our Policy on Complementary Workforce). In some markets, GSK will make compliance with this Code a condition of CW supplier contracts; it is then the supplier's responsibility to set specific behavioural expectations for its employees in compliance with this Code.



“Our Values help us to make good decisions that benefit our patients and consumers, our business and our reputation.”

Emma Walmsley, CEO



How can I play my part?

We are a multi-national company of over 100,000 employees and many complementary workers. We work in more than a hundred countries so this Code of Conduct helps us to define our expectations. But we are much more than just numbers. We are a community united by our values.

- Live by our values at all times and understand our individual contribution.
- Remember your actions will be reviewed against our values no matter where you work.
- Understand the intent of our policies and standards and use them every day to guide your actions beyond the requirement of the law.
- Recognise the laws and regulations of one country can impact business activities in another and we must adhere to them.
- Ensure that anyone you manage is also living our values and adhering to this Code of Conduct.

“We are much more than just numbers.”

“We are a community united by our values.”



Our GSK Expectations guide the way we expect employees to deliver our strategy:

- Set direction and inspire
- Work across boundaries
- Release energy
- Develop capability and talent
- Drive performance
- Live our values





Why should we all follow our Code of Conduct?

We must all abide by the law, but our Code of Conduct goes beyond that. It sets out how we should live our values and achieve our mission through ethical actions. It also establishes the standards and policies that help us manage the risks associated with operating in a heavily regulated industry. Our values define us, help us build trust with society, and direct us to do the right thing every day.



Why is our industry so heavily regulated?



The legal and regulatory requirements of our industry exist to protect patients and consumers.



Why are industry regulations so important to the way we work?



We are committed to our mission to help people do more, feel better and live longer. One way we do this is to take responsibility for abiding by country laws and regulatory requirements applicable to our business across the world.



Which laws do we need to follow?



We are a global company and so we must follow all applicable laws and regulations. We should also be aware that the laws and regulations of one country can impact business activities of another.

When local laws, regulations, applicable industry codes or other business specific GSK standards are stricter than our global written standards, you should work to the most stringent rules.

For example, we operate under stringent obligations that reinforce US healthcare laws and programme requirements associated with engaging US healthcare professionals and related activities, anywhere across the globe.

We also need to follow UK Anti-Bribery and Corruption law, and the US Foreign Corrupt Practices Act (FCPA) across our global business as well as individual countries' competition laws wherever we operate. These regulations make sure we compete on equal terms with no unfair advantages.

There are also strict laws regarding financial reporting and accounting that establish our global principles. We ensure our financial statements are reviewed independently and we are transparent in our dealings with them. We must not pass on non-public information that could be construed as insider trading.

For more information on our written standards visit **our values and standards resource centre** on Connect GSK.

Insights: Country laws

If you're unsure about the impact of different country laws on your local activities, or what the consequences of infringement might be, it's best to seek appropriate guidance. Often these country laws set minimum global standards and local laws, industry codes or GSK policies have stricter requirements. Global Ethics and Compliance (GEC) Officers and our Legal team are available to advise you.



What happens if we don't comply with this Code of Conduct?

Our corporate standards and policies apply to everyone who works for or on behalf of GSK. Failure to comply with them or any applicable legal and regulatory requirements may result in disciplinary action, up to and including dismissal. For senior managers this could include financial recoupment for significant misconduct. Managers have an additional responsibility to ensure their teams understand and comply with this Code of Conduct and applicable written standards.



What are our GSK Values?



Be patient focused

Put patients and consumers first

We focus on the individual, doing what is right for patients and consumers. We work with our partners and customers to improve healthcare and find new medicines and vaccines. Regardless of our role, we strive to understand how our work impacts patients and consumers.

How can we protect our patients and consumers?

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Are we conducting research ethically?

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Have we ensured product quality?

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Act with integrity

Do the right thing

We must all live up to the ethical standards that are rightly expected of us. That means we act with integrity and follow the law. More than that, we do everything we can to maintain the trust and respect of the organisations we work with and the communities in which we live and operate. By doing so, we protect the interests of our patients, consumers and our business.

Am I acting with individual integrity?

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Am I managing records properly?

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Demonstrate respect for people

Inspire each other to achieve great things

We should always show respect for colleagues and the communities around us. Everyone has a part to play in creating a fair and inclusive work environment that respects human rights and the diversity of the cultures we operate in. When we embrace diversity and individuality we can support and inspire each other to achieve great things.

Am I contributing to a values-based culture?

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Am I contributing to a healthy, safe and sustainable workplace?

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Are we employing people who meet our expectations?

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Operate with transparency

Be clear, be honest, be authentic

Transparency is vital to the way we work and helps us build trust. We strive to be honest and transparent about what we do and how we do it. This improves how we collaborate with each other and enhances the way we are seen by the communities we work with. It demonstrates that we are open to challenge, discussion and always want to improve how we operate.

Are we communicating openly?

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Are we building trust with society?

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Are we communicating appropriately?

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How can our values help us manage risk?

Our policies, standards and processes help us address the significant risks we face.

Our industry is highly regulated and scrutinised

Our values help guide our everyday behaviour:

-  **Be patient focused**
-  **Act with integrity**
-  **Demonstrate respect for people**
-  **Operate with transparency**

How should we act?

We should put patients and consumers first, act with integrity and transparency and demonstrate respect for people.

What should we know?

We should know our values and standards and use available tools to help us assess, treat, monitor and manage risk.

We have an Internal Control Framework to ensure that significant risks are reviewed and monitored and that specific issues and incidents are followed up and corrected with support from GEC and Legal.

How will GSK be seen?

We should consider if our actions may be misunderstood and, if so, whether that could be detrimental to our business.

Is it consistent with our values?

Does it meet regulations and laws?

Is it consistent with our policies?

Have I used the tools available to assess risk?

Could this be misunderstood by the public?

How would I feel if I were a patient or consumer?



Our speak up culture

Our speak up culture and procedures encourage everyone to raise concerns about potential unethical or illegal conduct. They also assure protection from retaliation, retribution, or any form of harassment to those reporting such concerns.

Read more on page 36





Be patient focused

Put patients and consumers first

We focus on the individual, doing what is right for patients and consumers. We work with our partners and customers to improve healthcare and find new medicines and vaccines. Regardless of our role, we strive to understand how our work impacts patients and consumers.

How do I live this value?

Protect our patients and consumers in all you do

Conduct research ethically

Always ensure product quality

How can we protect our patients and consumers?

Connect GSK

- Medical governance
- Adverse event reporting
- Human safety information
- Code of Practice
- Scientific engagement
- Product information

Search these keywords on our values and standards resource centre

We can only gain our patients' and consumers' respect and trust by focusing on their needs. That means always thinking from their perspective. We must always put their safety first, provide them with clear and up to date information and always promote our products appropriately and ethically. Our values demand that we think about and protect their interests at all times.

Have I ensured our promotional activities adhere to industry and GSK Expectations?

All our promotional activities and materials must conform to high ethical, medical and scientific standards. They must be based on valid scientific evidence and comply with all applicable laws, regulations and industry marketing codes.

We are committed to ensuring that we all follow our Code of Practice for the correct part of our business. They set our minimum standards. If local laws, industry codes or GSK policies set higher standards, we always live by the strictest requirement.

Have I followed the principles of scientific engagement?

Protecting our patients and consumers means we make sure our scientific engagement is clearly distinct from the promotion of our products. Legally and ethically, we have a responsibility to never disguise or misuse our research to influence healthcare professionals and others inappropriately.

Have I ensured product information is accurate?

From our patients' and consumers' perspective it's simple: they want accurate information that tells them how to use our products safely and effectively. That means we always strive to provide complete and evidence-based product information to healthcare professionals and consumers, wherever they are in the world.

Our commitment to protecting patients means we always update that information to reflect new safety and efficacy information as soon as it's available. We also have medical experts on hand to answer any questions from healthcare professionals accurately and promptly.

How do I report a concern about a GSK product?

If you hear of any information regarding a side effect, adverse reaction, or other potential issue with the effectiveness of a GSK product, you must report it.

We are committed to identifying and managing human safety information (HSI) to help safeguard those who take our products or take part in our clinical trials. If you become aware of any HSI in the course of your work, you must report it to the Central Safety Department (CSD), or your Local Operating Company (LOC) medical department within 24 hours. HSI from clinical trials is reported as described in the study protocol.

Protecting our patients means taking this information seriously. We provide regular reports and discuss actions with regulatory authorities. Actions can include modifying prescribing information or patient leaflets or carrying out additional clinical trials. Depending on the case, the adverse event may result in the design of new studies to further investigate the risk, withdrawing the product from sale or initiating a product recall.

The HSI/Adverse Event Reporting website includes information on how to do this.

Are we conducting research ethically?

Being patient focused demands that we carry out all our research to the highest ethical standards. From safeguarding patients' personal information to sharing research data – we do everything we can to keep patients and consumers safe while developing products that will meet their needs.

Connect GSK

- Clinical trials
- Human samples
- Animal welfare

Search these keywords on our values and standards resource centre

Have I followed all research protocols and standards?

The safety and wellbeing of patients who volunteer to participate in our clinical trials is paramount. Our patient-first approach means we are committed to conducting human subject research to the highest ethical, medical and scientific standards. Following research protocols and standards means we protect those who participate in our research to the best of our ability.

Do I understand why we provide access to our research data?

We share expertise, resources, intellectual property and know-how with external researchers and the scientific community to help advance science. We know that we won't discover everything inside our own laboratories so we make sure we provide external researchers with access to our anonymised trial data. This means the valuable contribution made by volunteers who participate in our research can be used in other studies. We always protect patient confidentiality and ensure information is used for valid scientific enquiry.

"The safety and wellbeing of patients who volunteer to participate in our clinical trials is paramount."



Insights: Code of Practice

We have two Code of Practice documents. They set out the specific minimum standards for our Consumer Healthcare and Pharmaceutical activities. Please ensure you use the correct one depending on your role:

- Our Code of Practice for promotion and scientific engagement (prescription medicines)
- Consumer Healthcare Code for promotion and scientific engagement



Insights: Scientific engagement

Scientific engagement is the exchange of scientific information with external communities to help us develop and understand the effectiveness of our medicines. It refers to non-promotional interactions and can happen at any stage during development.

Once a product has been authorised for sale, we must be careful how we promote our products and never use scientific engagement findings or practice to influence healthcare professionals or other healthcare staff inappropriately. See our Codes of Practice for more information.



Have we ensured product quality?

Connect GSK

- Quality control
- Trademarks
- Counterfeiting
- Suspect products
- GxP regulations
- Computerised systems validation
- Good manufacturing practices
- Product quality

Search these keywords on our values and standards resource centre

Putting patients first means always making sure our products are of the highest quality and safe to use. This commitment demands that we implement and follow strict guidelines that control both manufacturing and supply. As ever, the needs of our patients and consumers are our primary concern, so we should always remember that there is a person at the end of the supply chain. By living by this value, we also help to protect our reputation and profitability.

Have we managed the quality of our products effectively?

Our quality management system (QMS) ensures we comply with global and local regulations and assures product safety, quality and efficacy. We use it to help us maintain a state of control over our products and processes. These in turn make sure our patients and consumers receive medicines, vaccines and consumer healthcare products that benefit them.

Have I noticed any potential counterfeit GSK products?

We are committed to protecting our patients and consumers from counterfeit products that put their health in danger. That means we are all responsible for reporting any suspected counterfeiting of pharmaceutical, vaccine or consumer healthcare products. When you submit a report about a suspect product we will ensure the information is acted

upon and distributed to all appropriate parties. If you detect a product that you suspect is a GSK counterfeit you should report it immediately to counterfeits@gsk.com

Are we following good practices?

Protecting patients means using Good Practice standards throughout our business, on site, in the laboratory, in the clinic or in the office. For example, we monitor and document our work thoroughly to ensure integrity of regulated records. We also validate our computerised systems that support any regulated GxP processes. This makes sure that each element of the process is traceable, accountable and ready for inspection. Adhering to these guidelines helps us meet minimum regulatory requirements. More importantly, it helps us ensure our products are of the highest quality and minimises any potential risks to patients and consumers.



Insights: Counterfeit products

Counterfeit medicines and healthcare products pose a serious threat to the health and safety of patients and consumers. Counterfeits frequently lack the active ingredients to combat the illnesses they claim to treat and often contain impurities that can actively harm patients and consumers. We must be alert to the threat of counterfeit products. If you see a GSK product that you suspect is counterfeit you should report it immediately.



Frequently asked questions

Protect our patients

What is human safety information?
We regard human safety information (HSI) as anything that relates to human health or wellbeing following exposure to our products. This information should be reported within 24 hours. Details of what should be reported and how you can do this can be found on the [human safety information/adverse event reporting site](https://www.gsk.com/human-safety-information/adverse-event-reporting-site).

What is an adverse event?
An adverse event is any sign of illness in a patient associated with the use of a GSK product whether or not you think it might be related to the product, device or vaccine. These should be raised with the safety department within 24 hours of initial awareness via an online form.

Conduct research ethically

Where do we post clinical trial information?
We post protocol and result summaries on the GSK clinical study register, regardless of whether the outcomes might be considered positive or negative. We also post to other registers such as [clinicaltrials.gov](https://www.clinicaltrials.gov) as required by local laws and regulations.

What is personally identifiable information?
Personally identifiable information (PII) is data that can reasonably be used to identify someone. Those who are involved in our clinical trials entrust us with personal information and we must do our utmost to protect their privacy.

Ensure product quality

What does GxP mean?
GxP refers to a range of Good Practice quality guidelines that we follow. It encompasses the underlying international pharmaceutical requirements, such as those set forth in the US FD&C Act, US PHS Act, FDA regulations, EU Directives, Japanese regulations, or other national legislation/regulations under which our company operates.

The x refers to different categories and these include but are not limited to:

- Good Manufacturing Practice (GMP)
- Good Clinical Practice (GCP)
- Good Laboratory Practice (GLP)
- Good Distribution Practice (GDP)



Act with integrity

Do the right thing

We must all live up to the ethical standards that are rightly expected of us. That means we act with integrity and follow the law. More than that, we do everything we can to maintain the trust and respect of the organisations we work with and the communities in which we live and operate. By doing so, we protect the interests of our patients, consumers and our business.

How do I live this value?

Act with individual integrity

Manage records properly

Safeguard GSK assets

Am I acting with individual integrity?

Integrity starts with individual responsibility. If we always aim to do the right thing – and speak up if something doesn't feel right – we are acting with individual integrity. We should always consider if our behaviour means our integrity could be compromised or misconstrued.

Connect GSK

- ABAC (Anti-bribery and corruption)
- Fraud
- Conflicts of interest
- Gifts, entertainment and hospitality
- Travel, meetings and expenses
- Buying goods and services
- Grant of Authority (GOA)
- Quality culture
- Share dealing

Search these keywords on our values and standards resource centre

Have I avoided all conflicts of interest?

As individuals, we need to carefully consider any situation that could undermine our impartiality. For example, when making procurement decisions, it would be inappropriate to have family members on the supplier list. To act with integrity, you must avoid any perceived conflict of interest.

Is it appropriate for me to deal in shares?

There are occasions when it is not appropriate to buy or sell GSK shares, or those of our partners. Our knowledge through our work may mean that we have access to information which is not publicly known, and which could affect GSK's share price or that of our partners if it were known. To trade in shares when in possession of such knowledge is illegal.

Am I building quality into everything that I do?

Committing to quality means taking responsibility for improving working practices and overall outputs for the benefit of patients. We need to be passionate about quality as a personal value and always be prepared to learn from our failures as well as our successes. Search Quality Culture on Connect GSK to find out more.

Are gifts or hospitality I want to provide appropriate?

Like any business, we sometimes provide and accept gifts, hospitality or entertainment. In every case, we must consider if it is appropriate. You should ask yourself if the gift or hospitality could be misconstrued as a bribe. Before offering or accepting

anything you should make sure it is low in value, customary in a normal business relationship and is unlikely to influence the other party's or your own decision-making.

If it is linked to a sale, seen as excessive or could be misconstrued as a bribe then you should not offer or accept a gift or hospitality. Seek guidance from Global Ethics and Compliance if you are unsure.

Am I following the correct financial procedures?

Our financial, accounting and procurement controls are designed to ensure that we do not mislead investors, legislators, authorities and the public about financial aspects of our company.

If you are buying goods and services you must follow the correct procurement procedure. Make sure you have the appropriate approvals according to our Grant of Authority (GOA) policy before committing to the purchase. GSK employees have differing transaction spend limits depending on this authority and these must have leadership approval.

Am I treating suppliers fairly?

We rely on thousands of suppliers to enable us to do business. They are a key part of how we operate as a company. If you buy goods and services, you have a responsibility to ensure that we maintain a good relationship with them, treating them with respect, integrity and dignity.

You must also ensure that you are following our procurement processes. Working with Procurement will help ensure that you always use preferred suppliers and the necessary purchase orders are raised before committing spend.

Am I managing records properly?

When managing business and personal records we must always consider how our actions could impact our business and patients and consumers. That means taking care to safeguard personal information, keeping records up to date and gathering market and competitor information in the right way.

Connect GSK

- Personally identifiable information (PII)
- Global records retention
- Competitive intelligence
- Data integrity

Search these keywords on our values and standards resource centre

Have we safeguarded personally identifiable information?

We must exercise the highest standards when dealing with personal data that we collect during clinical trials or we hold about our employees. Collectively, we have a duty to protect the information that people entrust us with and ensure it is never misused.

Is my record keeping up to date and relevant?

It is also important that we manage the life cycle of our records so that we don't keep them longer than necessary. Good record keeping helps us protect our intellectual property, comply with legal, financial and regulatory requirements, and avoid unnecessary costs.

Have we collected competitive intelligence ethically?

As a company, we gather competitive intelligence ethically and in compliance with all laws and regulations. We often use regulated specialist third party suppliers to carry out this activity on our behalf. We should not compromise this approach by seeking to obtain or use information about our competitors' formulae, processes, patents or pending deals.

"We rely on thousands of suppliers to enable us to do business. They are a key part of how we operate as a company."

"We must exercise the highest standards when dealing with personal data."



Insights: Data integrity

We maintain data integrity by ensuring that information is captured accurately and stored correctly. This is important because much of our work relies on having robust data and information. In addition to meeting legal and regulatory requirements it means we have accurate information when making important decisions about our products or our people.



Have I safeguarded GSK assets?

Acting with integrity extends to the way we manage company assets, both tangible and intangible. It includes our daily use of IT systems and how we protect our information and intellectual property.

Connect GSK

- Use of IT systems
- Safeguard GSK information
- Protect intellectual property

Search these keywords on our values and standards resource centre

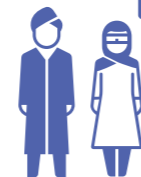
Am I using technology professionally?

We are responsible for using IT resources in an appropriate and professional manner at all times. For example, you should never use cloud services and tools to create or store GSK information unless approved by our IT team. You should also never use our systems to engage in illegal or inappropriate behaviour – it puts GSK and personally identifiable information at risk. Any leak can cause serious damage to our brand, reputation and operations.

Am I safeguarding GSK information?

We need to understand the different types of information we create and protect them appropriately. There are four categories of GSK information:

1. Approved for public release
2. Proprietary
3. Confidential
4. Critical and sensitive



“Any data leak can cause serious damage to our reputation.”



Insights: Using your own devices for GSK business

If you use your own smartphone, tablet or any other personal device for GSK business purposes you must ensure that you are complying with company policies. This may include allowing GSK to manage aspects of the device, such as enforcing password controls, locking the device after a defined period of time and remotely wiping the device. If your device is lost or stolen you must report it to the helpdesk immediately. You are responsible for deleting GSK data from the device before recycling, disposing of devices or transferring ownership.



Frequently asked questions

Act with individual integrity

What are red flags?

Red flags are warning signs. They are potential issues that may affect us conducting our business with integrity. It is everyone's responsibility to identify, understand and address red flags before engaging with a third party. We have developed a centre of excellence for ABAC (Anti-bribery and corruption), TPO (Third party oversight) and S&EC (Sanctions and export controls) to support everyone at GSK in managing red flags.

What is a Grant of Authority (GOA)?

If you are a GSK employee or complementary worker and you are purchasing goods or services on behalf of GSK, you will need to operate within your approval limit. This is your maximum GOA. All purchases must be made from preferred suppliers and follow the appropriate purchasing process.

Manage records properly

How do we safeguard personally identifiable information (PII)?

All employees and complementary workers who have access to or work with PII must complete relevant training. Your line manager is responsible for arranging this training for you so you should check with them if you are required to do it.

This policy extends to all third-party suppliers that process personally identifiable information on behalf of GSK.

Safeguard GSK assets

What do I do if I suspect a data breach?

It is important that any data breach or security incident is reported promptly. You can email CSIR@gsk.com, or complete the online form. The breach will then be classified into a severity level and dealt with appropriately.



Demonstrate respect for people

Inspire each other to achieve great things

We should always show respect for colleagues and the communities around us. Everyone has a part to play in creating a fair and inclusive work environment that respects human rights and the diversity of the cultures we operate in. When we embrace diversity and individuality we can support and inspire each other to achieve great things.

How do I live this value?

Contribute to a values-based culture

Create healthy, safe and sustainable workplaces

Employ people who meet our expectations

Am I contributing to a values-based culture?

We want to be confident our workplaces are diverse, safe and supportive. To make sure this happens we treat each other with respect. We also recruit people who share and are committed to upholding our values. We operate in a responsible and ethical manner and understand our responsibility to uphold human rights.

Connect GSK

- Human rights
- Equality and inclusion
- Diversity

Search these keywords on our values and standards resource centre

Have I understood our commitment to human rights?

Our responsibility for upholding human rights is far-reaching, encompassing areas such as access to medicines, patient safety and conduct of clinical trials. You can play your part by demonstrating respect for people in your everyday actions. This includes respecting all labour laws, ensuring we are not party to any form of forced labour, working to avoid discrimination in the workplace and looking after the health and safety of our colleagues. We must also ensure that any suppliers from which we buy goods or services, and any third parties we work with, share our commitment to labour and human rights.

Do I treat people equally?

Our values demand that we treat everyone on an equal and inclusive basis. By doing so, we attract and retain the best people. We also reflect the diversity and characteristics of the communities in which we operate and the customers we serve. We do not tolerate harassment or discrimination of any kind.

Insights: Being a responsible business

We can show respect for the communities around us by being a responsible business. One way we do this is by reducing our impact on the planet. We are working towards being carbon neutral by 2050 and have also set ourselves some challenging short-term goals. By 2020, we are aiming to:

- Reduce the waste we send to landfill to zero
- Reduce the waste we generate by 50%
- Reduce our carbon footprint by 25%
- Reduce our impact on local water resources by 20%



Am I contributing to a healthy, safe and sustainable workplace?

Our mission is to help people do more, feel better and live longer. This applies to our people too and that means creating healthy working environments that help people flourish. We must look after ourselves and each other. We are also committed to reducing the environmental impact of our operations.

Connect GSK

- Health and wellbeing
- Crisis and continuity planning
- Environment, Health, Safety & Sustainability (EHS&S)

Search these keywords on our values and standards resource centre

Do I prioritise my own health and wellbeing and that of my colleagues?

We offer many opportunities and services to help us all make healthy choices and boost our energy both at work and at home. You can find advice on improving workstation set-up, seeking travel health advice before a business trip and maintaining energy and resilience during the working day.

How can I keep myself and others safe at work?

The safety of our people is crucial; it helps us maintain a strong, resilient and high-performing workforce. If you identify a potential hazard or feel that certain behaviours or practices may cause harm, please raise your concern. We want everyone to feel safe when working for GSK.

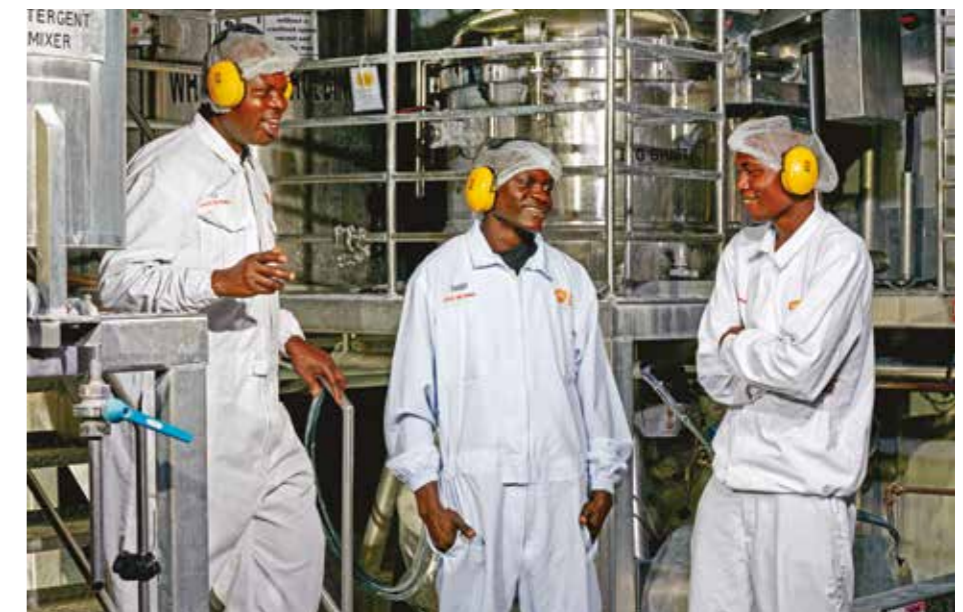
Am I prepared for a crisis situation?

Safety is particularly important in a crisis. We prepare for possible events to protect our people and ensure that our business can survive any disruptions including man-made or natural disasters. It is important to keep your contact information up to date to ensure you, or a designated emergency contact, are contactable in an emergency or crisis situation.

Am I contributing to our challenging sustainability targets?

Protecting our planet is so important to us that we're building sustainability into our business. If we all consider sustainability in our everyday decisions and ways of working, collectively we can make a real difference. Achieving our ambitious targets to reduce carbon, water and waste is one way we will contribute to protecting human health and our environment now and in the future.

"We are working towards being carbon neutral by 2050."



Are we employing people who meet our expectations?

To work effectively we need to have collective trust in each other at all times. That can only happen if we take extra care to recruit people who work in line with our values and demonstrate the GSK Expectations. This applies as much to our complementary workforce and third parties as it does our own people.

Connect GSK

- Human Resources (HR)
- Pre-employment screening
- Complementary workers
- Third parties

Search these keywords on our values and standards resource centre

Have I followed our recruitment processes?

To protect our people and assets we need to make sure we hire or contract people with the right qualifications and experience. That means we undertake pre-employment screening for all employees and complementary workers before they are hired or contracted. This helps to ensure that everyone who works at GSK is committed to working in a culture based on our values.

Are our complementary workers meeting our expectations?

We expect our complementary workforce of agency and outsourced workers to live our values. They are an important asset to our business and we benefit greatly from working with them. Those who manage complementary workers must adhere to relevant policies as well as local laws.

“To protect our people and assets we need to make sure we hire people with the right qualifications and experience.”



Insights: Third parties

We strive to conduct business with third parties (including complementary workers, suppliers, promotional partners and other business partners) who share our commitment to high ethical standards and operate in a responsible and ethical manner. We expect our third parties to share our values and operate in full compliance with all applicable laws, rules, regulations and GSK policies.



Frequently asked questions

Contribute to a values-based culture

What do we mean by inclusive?
Being inclusive means that we value the unique knowledge, perspective, experience and style an individual can bring to our business. We seek to value and draw on the differing knowledge, perspectives, experiences and styles that we are lucky to have in our global community.

What is our commitment to human rights?
You can read more about our commitment to human rights in the GSK Human Rights Statement. We are committed to upholding numerous human rights standards, including the Universal Declaration of Human Rights. We strive to create a working environment that reflects the diversity of the communities in which we operate and the patients and consumers we serve.

Create healthy, safe and sustainable workplaces

Where can I find information on working safely at GSK?
We have established a framework to help us protect and promote employee health and safety through a range of programmes. Our EHS&S website has lots of tips and helpful information on ergonomics, driver safety, travel health, energy, resilience and more.

Where can I go for help if personal issues are affecting my work?
We can help you with independent support and counselling services covering financial and legal advice, family support, mental health and more. Services are confidential. Find more information on the Employee Assistance Programme on Connect GSK.

Employ people who meet our expectations

What is the complementary workforce?
Our complementary workforce refers to those who provide services to GSK but are not GSK employees. This workforce includes agency workers, outsourced workers and those who have agreed a statement of work. There are some specific rules around the engagement of complementary workers in the UK and US – search complementary workers on Connect GSK for more.



Operate with transparency

*Be clear, be honest,
be authentic*

Transparency is vital to the way we work and helps us build trust. We strive to be honest and transparent about what we do and how we do it. This improves how we collaborate with each other and enhances the way we are seen by the communities we work with. It demonstrates that we are open to challenge, discussion and want to improve the way we operate.

How do I live this value?

Communicate openly

Build trust with society

Communicate appropriately

Are we communicating openly?

Communicating openly means sharing the benefits of our research with the wider industry to advance medical knowledge. It also means talking openly with colleagues and having the courage to speak up about anything that resembles corruption or bribery in our organisation. To be transparent, we must be honest.

Connect GSK

- Clinical trials
- Communication
- Speak up
- ABAC

Search these keywords on our values and standards resource centre

Am I supporting a speak up culture?

We want everyone to feel comfortable about speaking up when they are unsure about a situation or when something doesn't seem right. We can manage risks better when all our people are transparent about potential vulnerabilities. We will listen and support you.

We encourage everyone to report concerns without fear of reprisal. In line with our value of respect for people, we treat all questions or concerns about ethics or compliance issues in a confidential manner, even if the person speaking up identifies themselves. We do so in a manner that is consistent with the need to investigate fairly, cooperate with governments and comply with legal obligations.

See more about our speak up culture and how to report concerns on page 36.

Am I transparent when dealing with colleagues?

We all need to communicate honestly and treat each other fairly. This includes being clear and honest about what we are trying to achieve and communicating in a timely, accurate and consistent way.

"We encourage you to have open conversations and support one another to recognise and deal with ABAC issues as early as possible."

"We all need to communicate honestly and treat each other fairly."



Have I had open conversations about anti-bribery and corruption risks?

Preventing bribery and corruption means equipping yourself with knowledge so you can assess vulnerabilities on a day-to-day basis. We encourage you to have open conversations and support one another to recognise and deal with issues as early as possible.

Are we sharing information to advance learning and understanding?

We share information so our clinical trials can support further work to benefit medical science and patient care. We have a long-standing commitment to data transparency. In 2004, we launched a Clinical Study Register which is accessible to the public online.

We post protocol and result summaries for human subject research on internal registers but we also share protocol and clinical study reports without personally identifiable information more widely. We aim to publish these studies as manuscripts in peer-reviewed journals in order to help advance understanding and enable the scientific community to learn from our research.

Are we building trust with society?

Operating transparently works on many levels. It's about the way we communicate, the way we conduct business with other organisations and the way we interact with communities and governments. At every level we need to make sure we are mindful of our responsibilities and do everything we can to be fair, open and never misleading in any way.

Connect GSK

- Grants and donations
- Political contributions
- Government officials
- Sanctions and export control
- Pulse

Search these keywords on our values and standards resource centre

Have I made sure grants and donations are appropriate?

We are committed to supporting legitimate and worthy causes in the communities in which we operate. We also actively promote and support public health. If you are involved in this area, you have a responsibility to check whether any grants and donations you make are in line with our standards.

Have I ensured our work with governments is ethical?

We often work with governments and have a responsibility to abide by our high standards and the special laws that apply in each case. Our ABAC framework sets out aspects of ethics that should be considered when dealing with government and non-governmental organisations. It's a complex area, so you should review all relevant documents and seek advice from Global Ethics and Compliance.

Have I understood we do not make political contributions?

Our policy is not to make contributions to political parties of any kind. This helps us to operate transparently – free from any political ties – and stay focused on putting patients and consumers first.

Have I followed sanctions and export control laws?

In some cases sanctions and export control laws may restrict or prohibit us from doing business with certain countries, governments, government officials, entities and individuals.

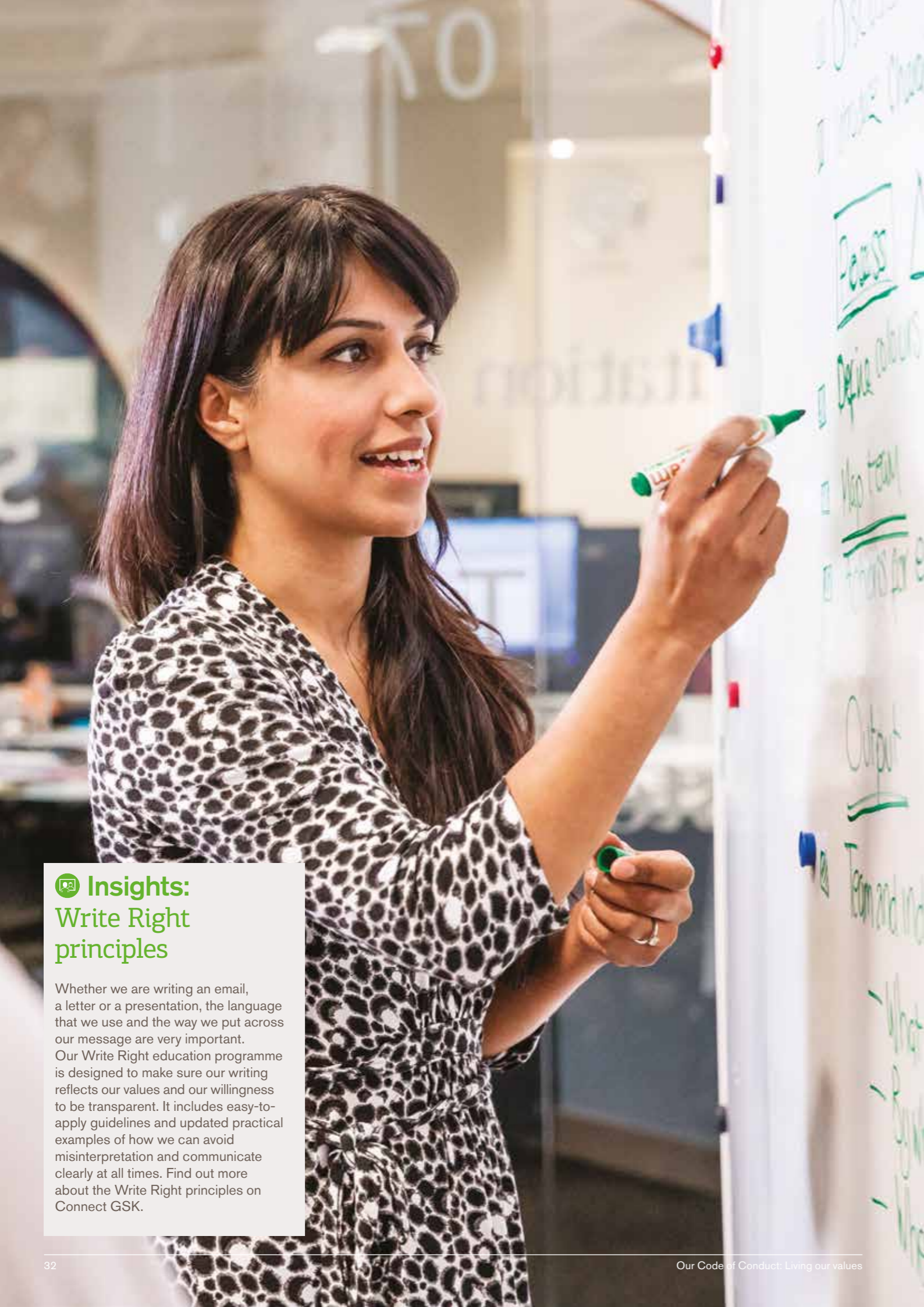
It is your responsibility to understand any restrictions that apply to you and to the activities you conduct for GSK so that we can comply with restrictions on financial transactions and the movement of our products, goods, materials, services, equipment, software and technology.

Insights: AllTrials campaign

We were the first pharmaceutical company to sign up to the AllTrials campaign for clinical trial transparency. We support the campaign's call for the registration of clinical trials and the disclosure of trial results and reports.

This means we share the results of all our clinical trials using anonymised patient data, irrespective of the trial outcome. Our online register receives thousands of visitors a month. See www.gsk-clinicalstudyregister.com





🗣️ Insights: Write Right principles

Whether we are writing an email, a letter or a presentation, the language that we use and the way we put across our message are very important. Our Write Right education programme is designed to make sure our writing reflects our values and our willingness to be transparent. It includes easy-to-apply guidelines and updated practical examples of how we can avoid misinterpretation and communicate clearly at all times. Find out more about the Write Right principles on Connect GSK.

🗣️ Are we communicating appropriately?

In today's world, we all have the power to communicate in many different ways. This presents many opportunities, but also dangers. Whether we are on or offline, we must coordinate and manage the way we communicate both with external audiences and internally among ourselves. We are committed to protecting our reputation and the trust that people place in us. These are precious assets and vital to our success.

📺 Connect GSK

- Reputation
- Digital communications
- Write Right principles

Search these keywords on our values and standards resource centre

Am I acting as a steward of our reputation?

The way we communicate with the outside world and internally is crucial to building trust. We must ensure all communications about our business interests are timely, accurate and reflect our values. We must also ensure communications comply with our policies, approval procedures, and all applicable laws.

Am I using social media appropriately?

As an individual you have the right to make personal comments on social media, including sharing GSK content approved for your individual use, making it clear that any opinion you express is your own. However it's important to remember that only trained spokespeople can make comments *on behalf* of GSK. When using social media, you must be careful that you don't inadvertently give away information that could be deemed 'inside information'. Examples could be the early release of sales figures or knowledge of a large company restructuring. Our policies around confidential information still apply on personal use of social media accounts.

🗣️ Frequently asked questions

Communicate openly

Where do I find out more about Anti-bribery and corruption (ABAC) risks?

Our ABAC foundation principles (legitimacy of intent, transparency, proportionality, conflict of interest or undue influence) are aligned to our values and help us detect and prevent bribery and corruption.

Read the ABAC handbook and get to know common risks so you can have open conversations with colleagues about them. It is up to you to:

- **Know** what is expected of you
- **Prevent** bribery and corruption by complying with our policies
- **Report** any concerns

Build trust with society

How can I contribute to society on behalf of GSK?

Our two flagship volunteering programmes offer our employees a chance to devote their time and expertise to create positive change in our communities around the world.

The **PULSE Volunteer Partnership** is a skills-based volunteering initiative. It is an opportunity to get to know some of our partner organisations and develop professional skills in challenging environments. In return we provide our partners with strategic planning, operational improvements and enhanced communications between our two organisations.

Orange Days give employees one paid day off each year to volunteer for their chosen local community project.

Communicate appropriately

Can I liaise with customers or suppliers through traditional or social media?

The key consideration is the purpose of your interaction. When communicating for GSK business purposes, please ensure you always use GSK IT authorised communications tools.

We use our values as a guide when communicating with colleagues, customers, suppliers or people who work on behalf of GSK in any online interactions. We should be fair, courteous and sensitive to how we are perceived at all times.

Do remember: while we are open and honest in our communications, we must not give away any confidential or proprietary information.



Connect GSK: Where can I find more information?

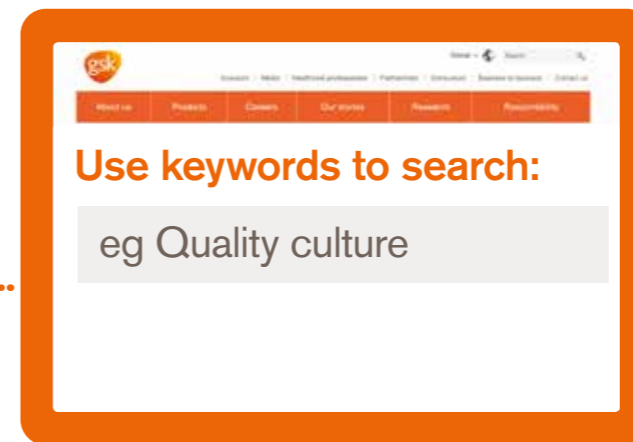
Log into our values and standards resource centre
With your MUDD ID on Connect GSK

Navigate the resource centre by topic or using keywords.

What will I find?

- More information on living our values
- Corporate written policies and standards
- Processes and frameworks
- Training and learning

Third parties should request access via their GSK contact.



Our speak up culture

We encourage everyone to raise concerns as early as possible

“ Ask questions, raise concerns, speak up. We will listen and support you. www.gsk.com/speakup ”

Individual responsibility, collective purpose
The kind of company we are depends on all of us



You have a vital role in helping us to put values at the heart of every decision we make.



Your legal obligation

As part of your contract of employment you have an obligation to understand our policies and standards, and to act appropriately. We must all comply with all industry regulations and the law.



Speak up: How do I raise a concern?

Ethical business conduct is the responsibility of everyone working for and on behalf of GSK. It is the foundation for building trust in our company and protects our licence to operate.



We will take disciplinary action up to and including dismissal (in accordance with local labour laws) against anyone who threatens or engages in retaliation or harassment of any person who has reported, or is considering reporting, a concern in good faith.

You can report concerns without fear of reprisal. If you see something you are unsure about then say something. If you are working for GSK, first consider speaking internally to a GSK manager, Human Resources (HR), Global Ethics and Compliance (GEC), or Legal.

If you can't, or feel uncomfortable discussing the issue internally, you can use any of the other channels we provide. Our telephone and internet reporting channels are managed independently of GSK and available globally. You can make your report anonymously if your country's laws and regulations permit it.

No matter how you choose to raise your concern, we treat all questions and issues as confidentially as we can while we investigate fairly, cooperate with governments, and comply with legal obligations. When you report a concern in good faith, we will support you.

If you are a manager you have an additional duty to raise any concerns brought to your attention. Those who ignore violations, or who fail to detect or correct them, could face disciplinary action.

Everyone must remember their responsibility to speak up if they see something that does not align with our values. By speaking up and raising concerns, we are living our values, and doing the right thing.

What happens if I contact the GSK speak up lines?

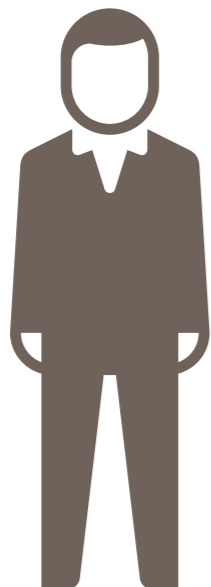
Once you've made your report, it will be forwarded appropriately within GSK for follow-up. For example, HR, GEC or Legal will review and contact you to address your concern.

Your concern will be handled promptly, discreetly and professionally. You can also request follow-up information about how we addressed your concern.



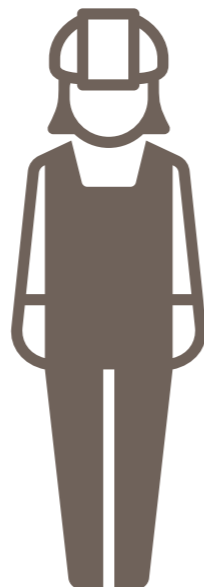
1

Option 1: Speak to your manager



2

Option 2: Raise a concern with local management, HR, GEC or Legal



3

Option 3: Report confidentially online, by telephone or by letter

www.gsk.com/speakup



**Go to our
values and standards
resource centre
on Connect GSK**

www.gsk.com

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